

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Jane Doe (J.R.L.), an individual,

Plaintiff,

v.

Civil Action No. 1:24-cv-13227-PBS

Hilton Domestic Operating Company Inc.;
Hilton Domestic Management LLC; and
Crosstown Center Hotel LLC d/b/a Hampton
Inn & Suites,

Defendants.

JOINT STIPULATION AGREEING TO EXTEND DEADLINES

Pursuant to Local Rule 16.1(g), Plaintiff Jane Doe (J.R.L.) (“Plaintiff”), Defendant Hilton Domestic Operating Company Inc. (“Hilton”), and Crosstown Center Hotel LLC d/b/a Hampton Inn & Suites (“Crosstown”) (collectively, the “Parties”), by and through their counsel, jointly stipulate and respectfully request that the Court enter the accompanying [Proposed] Order permitting a three-month extension of the current deadlines in this action.

I. BACKGROUND

This matter has been pending since December 31, 2024, when Plaintiff filed her Original Complaint (“Complaint”), Dkt. No. 1. Hilton and Crosstown each filed Motions to Dismiss the Complaint on March 24, 2025, Dkt. Nos. 16, 21. On May 6, 2025, the Court stayed discovery as to Hilton while it considered Hilton’s Motion to Dismiss the Complaint, Dkt. No. 16. Crosstown served discovery requests to Plaintiff during the period discovery was stayed as to Hilton. The Court denied Hilton’s and Crosstown’s respective Motions to Dismiss on November 18, 2025, Dkt. No. 72, and, on the same day, vacated the stay as to Hilton, Dkt. No. 73. Plaintiff served discovery requests on November 20, 2025. On December 2, 2025, Hilton filed its Answer, Dkt.

No. 75, and served its discovery requests on Plaintiff. Crosstown filed its Answer on December 4, 2025, Dkt. No. 77.

In furtherance of discovery, the Parties conferred regarding scheduling Plaintiff's deposition, which is key to gathering factual evidence in this matter; however, Plaintiff advised she is only available for deposition after the current fact discovery deadline of December 31, 2025. Considering this, the Parties agree deadlines in this matter should be extended to accommodate for Plaintiff's deposition, allow Hilton a chance to meaningfully participate in discovery, and ensure there is time for discovery to otherwise be properly completed.

II. STIPULATION

Agreed upon filing, but subject to the Court's approval, the Parties stipulate and agree to extend all remaining deadlines in this matter by three months, as follows:

Item	Current Deadline	Deadline Sought
Close of Fact Discovery	December 31, 2025	March 31, 2026
Exchange Settlement Proposals	January 8, 2026	April 8, 2026
Plaintiff's Expert Disclosures	January 30, 2026	April 30, 2026
Defendants' Expert Disclosures	March 31, 2026	June 30, 2026
Rule 56 Motions	April 30, 2026	July 30, 2026
Proposed Trial Date	150 Days / 5 Months After Close of All Discovery	150 Days / 5 Months After Close of All Discovery

Additionally, the Parties agree that any mediation in this matter should be continued to a later date, after the Parties complete additional discovery, to facilitate meaningful negotiations.

Good cause exists for this extension. The Parties have been diligent in their efforts to move forward with discovery, including in the short period since the discovery stay was lifted as to Hilton. However, Plaintiff is unavailable for her deposition until January 29, 2026, which is after the December 31, 2025 fact discovery cutoff date. Completing Plaintiff's deposition is significant to all Parties. Based on the current deadlines, Plaintiff's noticed deposition also falls after several

other important deadlines, including the current Court-ordered deadline to exchange settlement proposals and the date of the scheduled mediation conference. The Parties anticipate that additional information may be obtained in Plaintiff's deposition, such that the Parties will not be able to take informed positions on settlement until after Plaintiff's deposition is completed.

Therefore, these circumstances necessitate a three-month extension of all deadlines in this matter to ensure discovery is completed properly.

Accordingly, the Parties jointly request this Court enter the [Proposed] Order attached hereto as Exhibit A.

Dated: December 11, 2025

AGREED TO BY COUNSEL OF RECORD

/s/ Nicole M. Perry

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CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2025, a true copy of the foregoing document was filed with the Court and served upon all counsel of record via the Court's CM/ECF system.

/s/ Nicole M. Perry

Nicole M. Perry

CERTIFICATE OF CONFERENCE

Pursuant to Local Rules 26.2(c) and 37.1(b), I hereby certify that on December 11, 2025, I conferred with Plaintiff's counsel regarding this Joint Stipulation, and they consented and jointly agreed to the stipulation defined herein.

/s/ Nicole M. Perry

Nicole M. Perry